

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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| In re: |) | |
| |) | Chapter 11 |
| |) | |
| CAESARS ENTERTAINMENT OPERATING COMPANY, INC., <u>et al.</u> , ¹ |) | Case No. 15-01145 (ABG) |
| |) | |
| Debtors. |) | (Jointly Administered) |
| |) | |
| |) | |
| |) | |

**NOTICE OF MOTION OF SFI BELMONT LLC
FOR RELIEF FROM THE AUTOMATIC STAY TO PERMIT
SERVICE OF SUBPOENAS UPON CERTAIN OF THE DEBTORS**

PLEASE TAKE NOTICE that on the **22nd day of June, 2015, at 1:30 p.m. (prevailing Central Time)** or as soon thereafter as counsel may be heard, SFI Belmont LLC (“**SFI**”) shall appear before the Honorable A. Benjamin Goldgar or any other judge who may be sitting his place and stead, in the Ceremonial Courtroom (Room No. 2525) in the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604, and present the attached *Motion for Relief from the Automatic Stay to Permit Service of Subpoenas Upon Certain of the Debtors* (the “**Motion**”).

PLEASE TAKE FURTHER NOTICE that any objection to the Motion must be filed with the Court by **June 15, 2015 at 4:00 p.m. (prevailing Central Time)** and served on: (1) counsel for SFI; (b) proposed counsel to the above-captioned Debtors; (c) the Office of the United States Trustee for the Northern District of Illinois; and (d) any party that has requested

¹ The last four digits of Caesars Entertainment Operating Company, Inc.’s tax identification number are 1623. Due to the large number of Debtors in these jointly-administered chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtor’s claims and noticing agent at <https://cases.primeclerk.com/CEOC>.

notice pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure, which may be found at <https://cases.primeclerk.com/CEOC>.

PLEASE TAKE FURTHER NOTICE that copies of the Motion as well as copies of all documents filed in these chapter 11 cases are available free of charge by visiting <https://cases.primeclerk.com/CEOC> or by calling (855) 842-4123 within the United States or Canada or, outside of the United States or Canada, by calling +1 (646) 795-6969. You may also obtain copies of any pleadings by visiting the Court's website at www.ilnb.uscourts.gov in accordance with the procedures and fees set forth therein.

Dated: June 8, 2015

Respectfully submitted,

SFI Belmont LLC

By: /s/ Bryan E. Minier
One of its Attorneys

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Counsel for SFI Belmont LLC

CERTIFICATE OF SERVICE

The undersigned attorney certifies that on June 8, 2015, he caused a true and correct copy of the foregoing **MOTION FOR RELIEF FROM THE AUTOMATIC STAY TO PERMIT SERVICE OF SUBPOENAS UPON CERTAIN OF THE DEBTORS**, and associated notice of motion to be served via electronic mail on the service list attached hereto as **Exhibit A**, and via regular U.S. Mail, postage pre-paid, on the service list attached hereto as **Exhibit B**.

Dated: June 8, 2015

/s/ Bryan E. Minier

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EXHIBIT A

(Served via Electronic Mail)

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| Counsel to Dorothy Cullen | Testa, Heck, Scrocca & Testa, P.A. | Michael L. Testa, Esq. | mtesta@testalawyers.com |
| Counsel to Alfred Coletta, and Alfred and Rosemary Coletta, as Co-Guardians of Anthony Coletta, an Incapacitated Person, and LAD Hotel Partners, LLC and Comenity Bank | The Law Office of William J. Factor, Ltd. | Sara E. Lorber | slorber@wfactorlaw.com |
| Counsel to Comenity Bank | The Law Office of William J. Factor, Ltd. | William J Factor | wfactor@wfactorlaw.com |
| Counsel to the Dennis Mehringer 401k Profit Sharing Plan | The Law Offices of C. G. Gordon Martin | C. G. Gordon Martin | cggordonmartin@earthlink.net |

| DESCRIPTION | NAME | NOTICE NAME | EMAIL |
|--|---|---|---|
| Counsel to Thermal Energy Limited Partnership I | The Law Offices of Roger J. Higgins, LLC | Roger J. Higgins | rhiggins@rogerhigginslaw.com |
| Counsel to Moti Partners, LLC ("Moti") | The Stepnowski Law Offices | Frank Stepnowski, Esq. | frank@steppergroup.com |
| Counsel of record for Standard Textile Co., Inc. | Thompson Hine LLP | Louis F. Solimine, Esq. | Louis.Solimine@Thompsonhine.com |
| Attorney General | TN Dept of Revenue | c/o TN Attorney General's Office | bill.mccormick@ag.tn.gov |
| Counsel to ANV (Lloyds) | Traub Lieberman Straus & Shrewsberry | Christopher J. Nadeau | cnadeau@traublieberman.com |
| Indenture Trustee for 10.75% Senior Notes and 10.75%/11.5% Toggle Notes | U.S. Bank Global Corporate Trust Services | Deborah A. Ibrahim, Vice President | deborah.ibrahim@usbank.com |
| Counsel to Philip G. Satre | Ungaretti & Harris LLP | R. Scott Alsterda | rsalsterda@uhl.com |
| United States Trustee for the Northern District of Illinois | United States Trustee for the Northern District of Illinois | Attn: Denise DeLaurent | ustpregion11.es.ecf@usdoj.gov; denise.delarent@usdoj.gov |
| Attorney General | Washington DC Attorney General | Attn: Bankruptcy Department | oag@dc.gov |
| Counsel to Hilton Worldwide, Inc. and the Hilton Worldwide, Inc. Global Benefits Administrative Committee (collectively, "Hilton") | Weil, Gotshal & Manges LLP | Debra A. Dandeneau, David N. Griffiths & Dana M. Kaufman | debra.dandeneau@weil.com; david.griffiths@weil.com; dana.kaufman@weil.com |
| Counsel to Wilmington Trust Corporation, Wilmington Trust, National Association, as successor Indenture Trustee & Ad Hoc Group of Holders of 10.75% Guaranteed Notes | White & Case LLP | Attn: J. Christopher Shore & Harrison Denman | cshore@whitecase.com; hdenman@whitecase.com |
| Counsel to Wilmington Trust Corporation, Wilmington Trust, National Association, as successor Indenture Trustee & Ad Hoc Group of Holders of 10.75% Guaranteed Notes | White & Case LLP | Attn: Thomas E. Lauria | tlauria@whitecase.com |
| Counsel to Bossier Parish Policy Jury and City of Bossier City | Wiener, Weiss & Madison | Attn: R. Joseph Naus | rjnaus@wwmlaw.com |
| Counsel to Richard J. Davis, Examiner | Winston & Strawn LLP | Carrie V. Hardman, Richard W. Reinthaler & David Neier | dneier@winston.com; rreinthaler@winston.com; chardman@winston.com |
| Counsel to Richard J. Davis, Examiner | Winston & Strawn LLP | Gregory M. Gartland | ggartland@winston.com |
| Counsel to Giesecke & Devrient America, Inc. | Womble Carlyle Sandridge & Rice, LLP | Kevin J. Mangan, Esq. & Morgan L. Patterson, Esq. | kmangan@wcsr.com; mpatterson@wcsr.com |
| Creditor, Interested Party | WPB Partners LLC | Attn John Marshall | jmarshall@jmapartnersllc.com |
| Counsel to Churchill Downs, Incorporated | Wyatt, Tarrant & Combs, LLP | Daniel I. Waxman | dwaxman@wyattfirm.com |
| Counsel to Appaloosa Investment Limited Partnership I, OCM Opportunities Fund VI, L.P., Special Value Expansion Fund, LLC | Young Conaway Stargatt & Taylor, LLP | John T. Dorsey | jdorsey@ycst.com |
| Counsel to Certain Second Lien Noteholders | Young Conaway Stargatt & Taylor, LLP | Robert S. Brady, Edmon L. Morton & Robert F. Poppiti, Jr. | rbrady@ycst.com; emorton@ycst.com; rpoppiti@ycst.com |

EXHIBIT B

(Served via First Class Mail)

| DESCRIPTION | NAME | NOTICE NAME | ADDRESS 1 | ADDRESS 2 | ADDRESS 3 | CITY | STATE | ZIP |
|--|---|--|---------------------------------|--------------------------|-----------|----------------|-------|------------|
| Counsel to BOKF, NA, solely in its capacity as Successor Indenture Trustee | Arent Fox LLP | Mark B. Joachim & Jackson D. Toof | 1717 K Street, NW | | | Washington | DC | 20006 |
| Attorney General for the State of Illinois | Attorney General for the State of Illinois | Attn Bankruptcy Section | 500 S 2nd St | | | Springfield | IL | 62701 |
| Counsel to Indenture Trustee for the 10.00% Second-Priority Senior Secured Notes due 2018 and the 10.00% Second-Priority Senior Secured Notes due 2015 | Bryan Cave LLP | Stephanie Wickowski, Esq. & Michelle McMahon, Esq. | 1290 Avenue of the Americas | | | New York | NY | 10104 |
| Counsel to Indenture Trustee for the 10.00% Second-Priority Senior Secured Notes due 2018 and the 10.00% Second-Priority Senior Secured Notes due 2015 | Bryan Cave LLP | Ryan O. Lawlor, Esq. | 161 North Clark Street | Suite 4300 | | Chicago | IL | 60601-3351 |
| Gaming Commissions | Bureau of Gambling Control | Kamala D. Harris, Attorney General | 4949 Broadway, Suite E-231 | | | Sacramento | CA | 95820 |
| Debtors | Caesars Entertainment Operating Company, Inc. | Attn General Counsel | 1 Caesars Palace Drive | | | Las Vegas | NV | 89109 |
| Counsel to Administrative Agent | Cahill Gordon & Reindel LLP | William Miller, Esq. | 80 Pine Street | | | New York | NY | 10005 |
| Gaming Commissions | California Gambling Control | Tina Littleton, Executive Director | 2399 Gateway Oaks Dr. Ste 220 | | | Sacramento | CA | 95833-4231 |
| Administrative Agent for Credit Facility | Credit Suisse AG, Cayman Islands | Attn: Dennis Kao | Eleven Madison Avenue | | | New York | NY | 10010 |
| Indenture Trustee for the 10.00% Second-Priority Senior Secured Notes due 2018 and the 10.00% Second-Priority Senior Secured Notes due 2015 | Delaware Trust Company | Sandra E. Horwitz, Managing Director | 2711 Centerville Road | | | Wilmington | DE | 19808 |
| Illinois Department of Revenue | Illinois Department of Revenue | Attn: Bankruptcy Section | PO Box 64338 | | | Chicago | IL | 60664-0338 |
| Illinois Environmental Protection Agency | Illinois Environmental Protection | Attn: Director or Chief Legal Counsel | 1021 N Grand Ave E | | | Springfield | IL | 62702 |
| Gaming Commissions | Illinois Gaming Board (IGB) | Emily Mattison - General Counsel | 160 North LaSalle | Suite 300 | | Chicago | IL | 60601 |
| Gaming Commissions | Indiana Gaming Commission (IGC) | Ernest E. Yelton, Executive Director | East Tower, Suite 1600 | 101 W. Washington Street | | Indianapolis | IN | 46204 |
| IRS Insolvency Section | Internal Revenue Service | Centralized Insolvency Operation | PO Box 7346 | | | Philadelphia | PA | 19101-7346 |
| Counsel to Louisiana Horsemen's Benevolent and Protective Association 1993, Inc. | Johnson, Yacoubian & Paysse | Alan J Yacoubian | 701 Poydras St, Ste 4700 | | | New Orleans | LA | 70139-7708 |
| Counsel to UMB Bank, NA, Indenture Trustee | Katten Munchin Rosenman LLP | Craig A. Barbarosh, David A. Crichlow & Karen B. Dine | 575 Madison Avenue | | | New York | NY | 10022-2585 |
| Counsel to Wilmington Savings Fund Society, FSB, as successor Indenture Trustee for the 10.0% Second-Priority Senior Secured Notes due 2018 | Kelley Drye & Warren LLP | James Carr, Eric Wilson, Kristin Elliott | 101 Park Avenue | | | New York | NY | 10178 |
| Counsel to Certain Holders of Caesars First Lien Bonds who have Signed Restructuring Support Agreements | Kramer Levin Naftalis & Frankel LLP | Kenneth H. Eckstein, Gregory A. Horowitz, Douglas H. Mannal, Daniel M. Eggerman & Matthew C. Ziegler | 1177 Avenue of the Americas | | | New York | NY | 10036 |
| Indenture Trustee for the 5.75% Notes and 6.50% Notes | Law Debenture Trust Company of New York | James D. Heaney, Managing Director | 400 Madison Avenue, Suite 4D | | | New York | NY | 10017 |
| Indenture Trustee for 6.5% Senior Unsecured Notes and 5.75% Senior Unsecured Notes | Law Debenture Trust Company of New York | Attn: Thomas Musarra | 400 Madison Avenue, Suite 4D | | | New York | NY | 10017 |
| Counsel to Mesirow Financial Consulting, LLC | Mesirow Financial Holdings, Inc. | Attn: Jeffrey M. Levine | 353 North Clark Street | | | Chicago | IL | 60654 |
| Gaming Commissions | Mississippi Gaming Commission | ALLEN GODFREY, EXECUTIVE DIRECTOR | 620 North Street, Suite 200 | | | Jackson | MS | 39202 |
| Gaming Commissions | Missouri Gaming Commission | Roger Stottlemire, Executive Director | 3417 Knipp Drive | P.O. Box 1847 | | Jefferson City | MO | 65102 |
| Gaming Commissions | Nevada State Gaming Control Board & Gaming Commission | Michael LaBadie, Marc Warren, and David Staley | 555 East Washington Avenue | Suite 2600 | | Las Vegas | NV | 89101 |
| Gaming Commissions | New Jersey Division of Gaming Enforcement | David L. Rebuck, Director | 1300 Atlantic Avenue | | | Atlantic City | NJ | 08401-0000 |
| Gaming Commissions | North Carolina Department of Revenue | Lyons Gray, Secretary of Revenue | 501 N Wilmington St | | | Raleigh | NC | 27604 |
| Gaming Commissions | Ohio Casino Control Commission | John Barron, Deputy Executive Director & General Counsel | 10 West Broad Street, 6th Floor | | | Columbus | OH | 43215 |

| DESCRIPTION | NAME | NOTICE NAME | ADDRESS 1 | ADDRESS 2 | ADDRESS 3 | CITY | STATE | ZIP |
|--|---|---|--|----------------------------------|----------------|----------------|-------|------------|
| Gaming Commissions | Pennsylvania Gaming Control Board | Kevin F. O'Toole, Executive Director | P.O. Box 69060 | | | Harrisburg | PA | 17106-9060 |
| Counsel to Wilmington Trust Corporation and Wilmington Trust, National Association, as successor Indenture Trustee | Pryor Cashman LLP | Attn: Seth H. Lieberman & Patrick Sibley | 7 Times Square | | | New York | NY | 10036 |
| Interested Party | Rosenthal & Rosenthal, Inc. | Attn: Anthony DiTirro | 1370 Broadway | | | New York | NY | 10018 |
| Securities and Exchange Commission - Headquarters | Securities & Exchange Commission | Office of General Counsel | 100 F St NE | | | Washington | DC | 20549 |
| Gaming Commissions | State Lottery & Gaming Control Agency | Stephen L. Martino, Esq., Director | Montgomery Park Business Center | 1800 Washington Blvd., Suite 330 | | Baltimore | MD | 21230 |
| Attorney General | State of Arizona Attorney General | Attn: Bankruptcy Department | 1275 W. Washington St. | | | Phoenix | AZ | 85007 |
| Attorney General | State of California Attorney General | Attn: Bankruptcy Department | Consumer Law Section | 455 Golden Gate Ave Ste 11000 | | San Francisco | CA | 94102-7004 |
| Attorney General | State of Connecticut Attorney General | Attn: Bankruptcy Department | 55 Elm St. | | | Hartford | CT | 06106 |
| Attorney General | State of Georgia Attorney General | Attn: Bankruptcy Department | 40 Capital Square, SW | | | Atlanta | GA | 30334-1300 |
| Attorney General | State of Indiana Attorney General | Attn: Bankruptcy Department | Indiana Government Center South-5th Floor | 302 West Washington Street | | Indianapolis | IN | 46204 |
| Attorney General | State of Iowa Attorney General | Attn: Bankruptcy Department | Hoover State Office Bldg. | 1305 E. Walnut | | Des Moines | IA | 50319 |
| Attorney General | State of Kentucky Attorney General | Attn: Bankruptcy Department | 700 Capitol Avenue, Capitol Building | Suite 118 | | Frankfort | KY | 40601 |
| Attorney General | State of Louisiana Attorney General | Charmaine Moore, Gaming Division | P.O. Box 94095 | | | Baton Rouge | LA | 70804-4095 |
| Attorney General | State of Maryland Attorney General | Attn: Bankruptcy Department | 200 St. Paul Place | | | Baltimore | MD | 21202-2202 |
| Attorney General | State of Massachusetts Attorney General | Attn: Bankruptcy Department | 1 Ashburton Place | | | Boston | MA | 02108-1698 |
| Attorney General | State of Michigan Attorney General | Attn: Bankruptcy Department | 525 W. Ottawa St. | P.O. Box 30212 | | Lansing | MI | 48909-0212 |
| Attorney General | State of Minnesota Attorney General | Attn: Bankruptcy Department | State Capitol, Suite 102 | | | St. Paul | MN | 55155 |
| Attorney General | State of Mississippi Attorney General | Attn: Bankruptcy Department | Department of Justice, Walter Sillers Building | 550 High Street, Suite 1200, | P.O. Box 220 | Jackson | MS | 39205 |
| Attorney General | State of Missouri Attorney General | Attn: Bankruptcy Department | Supreme Ct Bldg. | 207 W. High St. | | Jefferson | MO | 65101 |
| Attorney General | State of Nevada Attorney General | Attn: Bankruptcy Department | Old Supreme Ct. Bldg. | 100 N. Carson St. | | Carson City | NV | 89701 |
| Attorney General | State of New Jersey Attorney General | Attn: Bankruptcy Department | Richard J. Hughes Justice Complex | 25 Market Street, | P.O. Box 080 | Trenton | NJ | 08625 |
| Gaming Commissions | State of New Jersey Casino Control Commission | Matthew B. Levinson, CEO | Arcade Building | Tennessee Avenue & Boardwalk | | Atlantic City | NJ | 08401-0000 |
| Attorney General | State of New York Attorney General | Attn: Bankruptcy Department | Department of Law -The Capitol, 2nd Fl. | | | Albany | NY | 12224-0341 |
| Attorney General | State of North Carolina Attorney General | Attn: Bankruptcy Department | Dept. of Justice | P.O. Box 629 | | Raleigh | NC | 27602-0629 |
| Attorney General | State of Ohio Attorney General | Attn: Bankruptcy Department | State Office Tower 14th Floor | 30 E. Broad St. | | Columbus | OH | 43266-0410 |
| Attorney General | State of Oregon Attorney General | Attn: Bankruptcy Department | Justice Bldg. | 116 2 Court St. NE | | Salem | OR | 97301 |
| Attorney General | State of Pennsylvania Attorney General | Attn: Bankruptcy Department | 1600 Strawberry Square | 16th Floor | | Harrisburg | PA | 17120 |
| Attorney General | State of Rhode Island Attorney General | Attn: Bankruptcy Department | 150 S. Main St. | | | Providence | RI | 02903 |
| Attorney General | State of South Carolina Attorney General | Attn: Bankruptcy Department | Remert C. Dennis Office Bldg. | P.O. Box 11549 | | Columbia | SC | 29211-1549 |
| Attorney General | State of Texas Attorney General | Attn: Bankruptcy Department | PO Box 12548 | | | Austin | TX | 78711-2548 |
| Attorney General | State of Utah Attorney General | Attn: Bankruptcy Department | PO Box 142320 | | | Salt Lake City | UT | 84114-2320 |
| Attorney General | State of Virginia Attorney General | Attn: Bankruptcy Department | 900 East Main Street | | | Richmond | VA | 23219 |
| Attorney General | State of Washington Attorney General | Attn: Bankruptcy Department | 1125 Washington St. SE | P.O. Box 40100 | | Olympia | WA | 98504-0100 |
| Attorney General | State of West Virginia Attorney General | Attn: Bankruptcy Department | State Capitol, Bldg 1 Room E 26 | 1900 Kanawha Blvd East | | Charleston | WV | 25305 |
| Attorney General | State of Wisconsin Attorney General | Attn: Bankruptcy Department | Wisconsin Department of Justice | State Capitol, Room 114 East, | P. O. Box 7857 | Madison | WI | 53707-7857 |
| Indenture Trustee for 10.75% Senior Notes and 10.75%/11.5% Toggle Notes | U.S. Bank Global Corporate Trust Services | Deborah A. Ibrahim, Vice President | One Federal Street | | | Boston | MA | 02110-0000 |
| Indenture Trustee for 10.75% Senior Notes and 10.75%/11.5% Toggle Notes | U.S. Bank National Association | Attn: Corporate Trust Services, Raymond S. Haverstock | 60 Livingston Avenue | | | St. Paul | MN | 55107-1419 |

| DESCRIPTION | NAME | NOTICE NAME | ADDRESS 1 | ADDRESS 2 | ADDRESS 3 | CITY | STATE | ZIP |
|--|--|--|-------------------------------------|--|-----------|-------------|-------|-------|
| Indenture Trustee for 11.25% Senior Secured Notes due 2017, 8.5% Senior Secured Notes due 2020, 9% Senior Secured Notes due 2020 | UMB Bank, National Association | Attn: Gavin Wilkinson | Corporate Trust and Escrow Services | 120 South 6 th Street, Suite 1400 | | Minneapolis | MN | 55402 |
| United States Attorney for the Northern District of Illinois | United States Attorney for the Northern District of Illinois | Attn: Bankruptcy Section | 219 S Dearborn St 5th Flr | | | Chicago | IL | 60604 |
| United States Trustee for the Northern District of Illinois | United States Trustee for the Northern District of Illinois | Attn: Denise DeLaurent | 219 S Dearborn St, Rm 873 | | | Chicago | IL | 60604 |
| Attorney General | Washington DC Attorney General | Attn: Bankruptcy Department | 441 4th Street, NW | | | Washington | DC | 20001 |
| Counsel to Wilmington Trust Corporation, Wilmington Trust, National Association, as successor Indenture Trustee & Ad Hoc Group of Holders of 10.75% Guaranteed Notes | White & Case LLP | Attn: J. Christopher Shore & Harrison Denman | 1155 Avenue of the Americas | | | New York | NY | 10036 |
| Indenture Trustee for 12.75% Second Lien Notes | Wilmington Savings Fund Society, FSB | Attn: Patrick J. Healy | 500 Delaware Avenue | | | Wilmington | DE | 19801 |

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|--|---|-------------------------|
| In re: |) | |
| |) | Chapter 11 |
| |) | |
| CAESARS ENTERTAINMENT OPERATING COMPANY, INC., <u>et al.</u> , ¹ |) | Case No. 15-01145 (ABG) |
| |) | |
| Debtors. |) | (Jointly Administered) |
| |) | |
| |) | |
| |) | |

**MOTION FOR RELIEF FROM THE AUTOMATIC STAY
TO PERMIT SERVICE OF SUBPOENAS UPON CERTAIN OF THE DEBTORS**

Plaintiff SFI Belmont LLC (“SFI”), by and through its counsel, hereby moves for relief from the automatic stay (the “Motion”) to allow SFI to serve debtors Des Plaines Development Limited Partnership (“Des Plaines Development”) and Harrah’s Illinois Corporation (“Harrah’s Illinois”) with subpoenas for documents. In support of its Motion, SFI respectfully states:

JURISDICTION

1. This Court has jurisdiction over this Motion under 28 U.S.C. §§ 1334 and 157 and 11 U.S.C. § 362(d)(1) and (2). This is a core proceeding pursuant to 29 U.S.C. § 157(b)(2)(G), (K), and (O). Venue is proper pursuant to 29 U.S.C. § 1408 and 1409.

2. The statutory predicates for the relief requested herein are sections 362(d)(1) and 362(d)(2) of title 11 of the United States Code (the “Bankruptcy Code”), Rules 4001 and 9014 of the Federal Rules of Bankruptcy Procedure, and Local Rule 4001.

¹ The last four digits of Caesars Entertainment Operating Company, Inc.’s tax identification number are 1623. Due to the large number of Debtors in these jointly-administered chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtor’s claims and noticing agent at <https://cases.primeclerk.com/CEOC>.

BACKGROUND

3. SFI is a party to two lawsuits pending in the Circuit Court of Cook County, County Department, Chancery Division, Nos. 13 CH 18740 and 13 CH 27418 (the “State Court Cases”) against John Q. Hammons Hotels Development, LLC (“Borrower”) and Jacqueline Dowdy and Gregory Groves, personally and as successor-trustees of The Revocable Trust of John Q. Hammons (“Guarantor”). Simplifying the allegations, the State Court Cases arise from a defaulted loan made by SFI to Borrower and guaranteed by Guarantor and as more fully described in the Affidavit of Elisha Blechner attached hereto as Exhibit A. The loan documents contain, among other things, provisions that require (a) Guarantor to maintain a minimum net worth, and (b) in the event Guarantor’s minimum net worth falls below a specific amount, Borrower to make a partial prepayment of the indebtedness owing to SFI, which amount would be sufficient to reduce the outstanding amount of the loan so as not to exceed 40% of Guarantor’s net worth (together, the “Net Worth Covenants”).

4. In the State Court Cases, SFI has alleged that Guarantor’s net worth has fallen below the specific amount required by the loan documents and that Borrower failed to make the required partial prepayment.

5. Debtor Des Plaines Development owns Harrah’s Joliet Hotel and Casino (the “Joliet Casino”). Guarantor is the holder of 20% of the equity interests in Des Plaines Development. The other 80% of equity interest in Des Plaines Development is owned by Debtor Harrah’s Illinois. *See* Des Plaines Development’s Statement of Financial Affairs, Docket No. 710 at 25.

6. As the value of Guarantor’s interest in Des Plaines Development and the Joliet Casino is a significant factual matter in the State Court Cases, SFI sought discovery on those

matters directly from Guarantor. Guarantor responded to SFI's discovery requests by objecting on numerous grounds and limiting any potential production to documents that it deems are relevant, in Guarantor's possession and dated between January 1, 2010 and December 31, 2014. In other words, Guarantor has refused to produce the documents SFI requested relating to the years 2004 through 2009 and gave no indication of which, if any, other categories of documents it would deem "responsive." Further, in response to previous requests for information from SFI, Guarantor has asserted that Des Plaines Development and Harrah's Illinois have refused to provide Guarantor with requested financial information about Harrah's Joliet, allegedly based on Guarantor's role as a limited partner. Notably, Guarantor has not produced any documents in response to SFI's requests.

7. As a result, SFI has not been able to procure adequate discovery on the value of Guarantor's interest in Des Plaines Development and the Joliet Casino in any manner other than seeking it directly from Des Plaines Development and Harrah's Illinois.

8. Accordingly, SFI seeks relief from the automatic stay to serve and, if necessary, enforce the document subpoenas attached hereto as Group Exhibit B (the "Subpoenas").

9. SFI is not, by either the State Court Cases or the Subpoenas, asserting any claims or relief against Des Plaines Development or Harrah's Illinois. The claims asserted in the State Court Cases are unrelated to the Debtors and will have zero effect on their reorganization efforts.

ARGUMENT

10. SFI seeks relief from the automatic stay for the limited purpose of propounding narrowly tailored requests for information upon two of the debtors in this case. Although relief from the automatic stay may not be required, SFI brings this Motion out of an abundance of caution.

11. The automatic stay does not apply to requests for information from debtors regarding claims by or against a non-debtor party. *Matter of Mahurkar Double Lumen Hemodialysis Catheter Patent Litigation*, 140 B.R. 969 (N.D. Ill. 1992) (“Section 362(a)(1) applies only to actions against the debtor”); *see also Le Metier Beauty Investment Partners LLC v. Metier Tribeca, LLC*, No. 13-4650, 2014 WL 4783008, at *5 (S.D.N.Y. Sept. 25, 2014) (“Section 362(a) does not prevent litigants from obtaining discovery from a debtor as a third-party witness where the requests pertain to claims against the nondebtor parties.”); *see also In re Miller*, 262 B.R. 499 (B.A.P. 9th Cir. 2001) (“[S]ection 362(a) does not preclude generation of information regarding claims by or against a non-debtor party, even where that information could eventually adversely affect the debtor.”); *Peter Rosenbaum Photography Corp. v. Otto Doosan Mail Order Ltd.*, 2004 WL 2973822 at 3 (N.D. Ill. 2004) (Granting plaintiff’s motion to compel, reasoning, “it is clear that plaintiff would be entitled to serve and proceed with discovery against [debtor], even if [debtor] were a defendant in this action, provided the discovery is directed towards the claims against defendants . . . because [debtor] is not a defendant, but simply an interested non-litigant, and the discovery sought relates to the defenses raised by [the defendants], the automatic stay is inapplicable.”). Although SFI is not required to seek relief from the stay, SFI nevertheless presents this Motion to the Court to provide Des Plaines Development and Harrah’s Illinois with an opportunity to respond to SFI’s request for information, and to obtain this Court’s approval for Des Plaines Development and Harrah’s Illinois to comply with the discovery requests.

12. Even if the automatic stay applied, the stay should be lifted because cause exists. 11 U.S.C. §362(d)(1); *In re of Fernstrom Storage and Van Co.*, 938 F. 2d 731, 735 (7th Cir. 1991). Section 362(d) “commits the decision of whether [cause exists] to lift the stay to the

discretion of the bankruptcy judge, [whose] decision may be overturned only upon a showing of abuse of discretion.” *In re Boomgarden*, 780 F. 2d 657, 660 (7th Cir. 1985).

13. The Seventh Circuit has highlighted three factors to be analyzed in determining whether cause exists: (a) the bankrupt estate or the debtor will be greatly prejudiced from continuation of the civil suit, (b) the hardship to the non-bankrupt party by maintenance of the stay considerably outweighs the hardship of the debtor, and (c) the movant has demonstrated a probability of success on the merits. *Fernstrom*, 938 F. 2d at 735. Applying this test, cause exists to lift the stay and allow SFI to proceed with its narrowly tailored discovery request.

14. First, neither the debtors nor the bankruptcy estate will be greatly prejudiced from complying with SFI’s Subpoenas, or even prejudiced at all. SFI seek a limited and narrowly tailored set of information from only two Debtors. Compliance with the subpoenas will require minimal effort from the Debtors as the information sought, historical financial information, should be readily available. Additionally, responding to the Subpoenas will not interfere with the restructuring efforts or deplete significant resources from the estate.

15. Second, SFI, by contrast, would face significant hardship if the Subpoenas were disallowed, far outweighing any nominal efforts Des Plaines Development and Harrah’s Illinois would expend complying with the Subpoenas. The information sought by SFI lies at the heart of the disputed issues in the State Court Cases. SFI has already sought to obtain the information by other means but has been unsuccessful. Thus, SFI seeks relief from this Court and requests the information from Des Plaines Development and Harrah’s Illinois directly.

16. The third factor – probability of success – merits little discussion. The State Court Cases are in the discovery phase and will likely be tried once discovery closes. *See id.* at 737 (“Where the stayed non-bankrupt litigation has reached an advanced stage, courts have

shown a willingness to lift the stay to allow the litigation to proceed.”) The ultimate outcome of the State Court Cases will be affected by the documents sought by the Subpoenas.

17. Accordingly, cause exists for the Court to lift the automatic stay to allow SFI to serve Des Plaines Development and Harrah’s Illinois with and, if necessary, enforce the Subpoenas.

NOTICE

18. Notice of this Motion has been provided to the Master Service List and 2002 List, as each term is defined in, and in accordance with, the *Order Granting in Part and Denying in Part Motion to Modify Case Management Procedures* [Docket No. 1165] (the “Case Management Order”). SFI submits that all Affected Entities, as defined in the Case Management Order, are contained within the Master Service List and 2002 List. SFI submits that, in light of the nature of the relief requested, no other or further notice need be provided.

NO PRIOR REQUEST

19. No prior application for the relief requested herein has been made by SFI to this or any other court.

CONCLUSION

WHEREFORE, based upon the foregoing, Plaintiff respectfully requests this Court enter an order (a) lifting or modifying the automatic stay as it relates to the information sought in SFI’s subpoenas, (b) requiring Des Plaines Development Limited Partnership and Harrah’s Illinois Corporation to comply with the subpoenas, and (c) granting any further that is just and proper.

Dated: June 8, 2015

Respectfully submitted,

SFI Belmont LLC

By: /s/ Bryan E. Minier
One of its Attorneys

Bryan E. Minier (ARDC # 6275534)
Pedersen & Houpt
161 N. Clark Street, Suite 2700
Chicago, Illinois 60601
Phone: (312) 261-2265
Fax: (312) 261-1265
Email: bminier@pedersenhaupt.com

Counsel for SFI Belmont LLC

EXHIBIT A

(Affidavit of Elisha Blechner)

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|---|---|-------------------------|
| In re: |) | |
| |) | Chapter 11 |
| |) | |
| CAESARS ENTERTAINMENT OPERATING |) | Case No. 15-01145 (ABG) |
| COMPANY, INC., <u>et al.</u> , ¹ |) | |
| |) | |
| Debtors. |) | (Jointly Administered) |
| |) | |
| |) | |
| |) | |

DECLARATION OF ELISHA BLECHNER

Elisha Blechner, under penalty of perjury, declares as follows:

1. I am a Senior Vice President for SFI Belmont LLC ("SFI") and have personal knowledge regarding the loans made to John Q. Hammons Hotels Development, LLC ("Borrower").

2. On or about September 16, 2005, iStar Financial, Inc. ("iStar") received a collateral assignment of, including a the right to enforce, various loan agreements (the "Loan Documents") pursuant to which loans and other financial accommodations totaling \$275,000,000 were extended to Borrower (the "Loans"). On the same date, John Q. Hammons, the Revocable Trust of John Q. Hammons, dated December 28, 1989, as amended and restated, and Hammons, Inc. (collectively "Guarantor") executed the "Guaranty," pursuant to which Guarantor agreed that it directly or indirectly owned all of the ownership interests in Borrower and would benefit from the making of the Loans and the financial accommodation extended pursuant to the Loan

¹ The last four digits of Caesars Entertainment Operating Company, Inc.'s tax identification number are 1623. Due to the large number of Debtors in these jointly-administered chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtor's claims and noticing agent at <https://cases.primeclerk.com/CEOC>.

Documents. Guarantor further agreed to unconditionally, absolutely and irrevocably guaranteed the due payment, fulfillment and performance of Borrowers' obligations under the Loan Documents.

3. On or about March 16, 2011, iStar assigned to its wholly-owned subsidiary SFI, all of its right, title and interest in the Loan Documents.

4. SFI is a party to two lawsuits pending in the Circuit Court of Cook County, County Department, Chancery Division, Nos. 13 CH 18740 and 13 CH 27418 (the "State Court Cases") Borrower and Guarantor. The Loan Documents contain, among other things, provisions that require (a) Guarantor to maintain a minimum net worth, and (b) in the event Guarantor's minimum net worth fall below a specific amount, Borrower to make a partial prepayment of the indebtedness owing under the Loan Documents, which amount would be sufficient to cause Guarantor's net worth amount to meet the minimum amount required by the loan documents (together, the "Net Worth Covenants").

5. In the State Court Cases, SFI has alleged that Guarantor's net worth has fallen below the specific amount required by the Net Worth Covenants and that Borrower failed to make the required partial prepayment.

Pursuant to 28 U.S.C. §1746, I, the undersigned, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on June 8, 2015

A handwritten signature in black ink, appearing to read 'Elisha Blechner', is written over a horizontal line.

Elisha Blechner

GROUP EXHIBIT B
(Subpoenas)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

SFI BELMONT LLC,

Plaintiff/Petitioner

v.

JOHN Q. HAMMONS HOTELS DEVELOPMENT, LLC, et al.,

Defendant/Respondent

No. 13 CH 18740 and 13 CH 27418 (Consolidated)

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: Des Plaines Development Limited Partnership c/o Harrah's Illinois Corporation
c/o Illinois Corporation Service C
801 Adlai Stevenson Drive, Springfield, IL 62703

- ☐ 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable _____
in Room _____, Illinois on _____,
at _____ m.
- ☐ 2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at: _____
in Room _____, Illinois on _____,
at _____ m.
- ☒ 3. YOU ARE COMMANDED to mail the following documents in your possession or control to KATTEN MUCHIN ROSENMAN LLP, Attn: Jennifer Ryan
at 525 W. Monroe Street, Chicago, IL 60661, on or before July 20, 2015,
at 5:00 p. m.
(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES.):
SEE ATTACHED RIDER.

☐ Description continued on attached page(s).

YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

Notice to Deponent:

- ☐ 1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows: _____

☐ Description continued on attached page(s).

(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

- ☐ 2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____
(Name of Recording Device Operator)
3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No. 41832 Pro Se 99500

Name: KATTEN MUCHIN ROSENMAN LLP

Atty. for: PLAINTIFF SFI BELMONT LLC

Address: 525 W. Monroe Street

City/State/Zip: Chicago, IL 60661

Telephone: (312) 902-5200

Issued by: _____

Signature

☒ Attorney

☐ Clerk of Court

Date: June 22, 2015

- ☒ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to _____
by certified mail, return receipt requested (Receipt # _____) on _____,
I paid the witness \$ _____ for witness and mileage fees.
- ☐ I served this subpoena by handing a copy to _____ on _____,
I paid the witness \$ _____ for witness and mileage fees.

(Signature of Server)

(Print Name)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Rider to Des Plaines Development Limited Partnership Subpoena

In accordance with the foregoing Subpoena in a Civil Matter and the Definitions and Instructions attached hereto as **Exhibit 1**, the Documents set forth in the following requests (“Requests”) are to be produced:

1. A copy of the Des Plaines Development Limited Partnership Agreement, together with all subsequent amendments and modifications.
2. Annual balance sheets, income and expense statements, and profit and loss statements for Des Plaines Development Limited Partnership or Harrah’s Joliet Casino Hotel for each of the years 2004 through 2014.
3. Documents sufficient to show distributions made to Des Plaines Development Corporation between 2004 and 2014.
4. An appraisal performed by Lehman in or about 2004 or 2005 and any subsequent appraisals of Des Plaines Development Limited Partnership, Harrah’s Joliet Casino Hotel, or their respective operations or subparts.
5. Schedule K-1s for Des Plaines Development Corporation for each of the years 2004 through 2014.
6. Form 1065s for Des Plaines Development Limited Partnership or Harrah’s Joliet Casino Hotel for each of the years 2004 through 2014.

EXHIBIT 1

Definitions and Instructions

- A. As used herein, the words and phrases set forth below shall have the following meanings prescribed for them:
1. “Harrah’s Joliet Casino Hotel” shall refer to the casino operations located at 151 North Joliet Street, Joliet, Illinois, 60432.
 2. “You,” “Your” and “Des Plaines Development Limited Partnership” shall refer to the entity that is a Delaware limited partnership, 20% of which is owned by Des Plaines Development Corporation, and does business as Harrah’s Joliet Casino Hotel.
 3. Reference to any entity in the Requests, Definitions or Instructions shall include its parents, divisions, subsidiaries, affiliates, current and former directors, officers, shareholders, partners, independent contractors, employees, agents, representatives, predecessors, successors, or assigns.
 4. “Communication(s)” shall include any oral or written communication or contact between two or more persons or entities, including without limitation written contact by such means as a letter, memorandum, telegram, telex, or any other document or documents, and oral contact, heard or overheard, by such means as a face-to-face meeting, radio, telephone conversation, or otherwise, and every other mode of intentionally conveying meaning.
 5. “Document(s)” shall include any method of recording or preserving information in its broadest sense (by written, electronic or other means), including but not limited to letters, memoranda, work papers, e-mail, checklists, forms, drafts, reports, analyses, notes, diaries, calendars, logs, computer disks or tapes or print outs, data files, tape recordings or transcriptions thereof, photographs, microfilm, microfiche, any other thing encompassed within the meaning of the term “Document” as used in the Code of Civil Procedure and the Illinois Supreme Court Rules and Communications as defined above.
 6. “Related to,” “relating to,” “reflected,” “reflecting,” and “regarding” shall include mentioning or describing, pertaining to, being connected with, having any relevance or pertinence to, or reflecting upon a stated subject matter, whether directly or indirectly.
- B. In construing this Subpoena:
1. The singular shall include the plural and the plural shall include the singular.
 2. A masculine, feminine, or neuter pronoun shall not exclude other genders.
 3. “And” and “or” shall be construed conjunctively rather than exclusively.

4. The word “including” shall be construed without limitation.
 5. The use of the past tense shall include the present tense and the use of the present tense shall include the past tense so as to make the subpoena inclusive rather than exclusive.
- C. Reference to any entity shall include its parents, divisions, subsidiaries, affiliates, current and former directors, officers, shareholders, partners, independent contractors, employees, agents, representatives, predecessors, successors, or assigns.
 - D. All electronically stored information (“ESI”) should be produced in native format linked to single-page tagged image file format (“TIFF”). ESI in TIFF should be identified by an Opticon cross-reference file. All metadata – data describing the nature or characteristics of the electronic files, e.g. “date last modified” – associated with ESI shall be produced (as a delimited text file that includes OCR) linked to the associated file.
 - E. All Documents shall be produced in an orderly manner (and with appropriate markings or other identification) so that SFI will be able to identify the source of the Document, the file in which the Document is or was maintained, the person to whom such file belongs or belonged, and the specific Request to which the Document is responsive.
 - F. In responding to the Requests, produce all Documents known or available to You regardless of whether such Documents are in Your direct possession or in the possession of Your agents, partners, employees, or representatives or are otherwise under Your control.
 - G. If any Document responsive to any Request is no longer in Your possession, custody, control or care, state whether the Document: (i) is missing or lost; (ii) has been destroyed; (iii) has been transferred voluntarily or involuntarily to others; or (iv) has been otherwise disposed of or discarded. In each such situation, set forth the facts surrounding such disposition, identify the person(s) directing or authorizing the disposition and list the disposition date.
 - H. If You object to any part of a Request, answer all parts of such Request as to which You do not object, and as to each part to which You do object, set forth the basis for the objection.
 - I. In responding to the Subpoena, the relevant time period shall be from January 1, 2014 through December 31, 2014, unless otherwise specified, and shall include all documents dated, prepared, drafted, sent, obtained, received, or that refer to events in this time period, even if prepared or published prior or subsequent to this period.
 - J. The Requests are continuing. Thus, if at any time prior to the trial of this action You obtain additional responsive Documents, You shall immediately produce such additional responsive Documents to the undersigned.

- K. All objections or answers to these Requests, which fail or refuse to respond fully on the ground of any claim of privilege of any kind whatsoever or other basis for nondisclosure, shall:
1. State the nature of the claim of privilege or nondisclosure and the basis for the claim;
 2. A description of all Documents, including:
 - a. The date of the Document;
 - b. The name and job title of its author(s) or preparer(s);
 - c. The name and job title of each person to whom the Document was sent or who has seen, had access to, or custody of the Document;
 - d. The Request to which the Document is responsive; and
 - e. In the case of any Document that relates in any way to an oral Communication, identify the participants and attendees of such Communication.
 3. Identify all persons on whose behalf the claim of privilege or nondisclosure is being asserted;
 4. Identify all persons having knowledge of any facts related to the claim of privilege or nondisclosure; and
 5. State all facts relied upon in support of or related to the assertion of privilege or nondisclosure.

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

SFI BELMONT LLC,

Plaintiff/Petitioner

v.

Defendant/Respondent

JOHN Q. HAMMONS HOTELS DEVELOPMENT, LLC, et al.,

No. 13 CH 18740 and 13 CH 27418 (Consolidated)

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: Harrah's Illinois Corporation

c/o Illinois Corporation Service C

801 Adlai Stevenson Drive, Springfield, IL 62703

- ☐ 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable _____
in Room _____, Illinois on _____,
at _____ m.
- ☐ 2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at: _____
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- ☒ 3. YOU ARE COMMANDED to mail the following documents in your possession or control to KATTEN MUCHIN ROSENMAN LLP, Attn: Jennifer Ryan
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(Name of Recording Device Operator)
3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No. 41832

Pro Se 99500

Name: KATTEN MUCHIN ROSENMAN LLP

Atty. for: PLAINTIFF SFI BELMONT LLC

Address: 525 W. Monroe Street

City/State/Zip: Chicago, IL 60661

Telephone: (312) 902-5200

Issued by: _____

Signature

☒ Attorney

☐ Clerk of Court

Date: June 22, 2015

- ☒ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to _____
by certified mail, return receipt requested (Receipt # _____) on _____,
I paid the witness \$ _____ for witness and mileage fees.
- ☐ I served this subpoena by handing a copy to _____ on _____,
I paid the witness \$ _____ for witness and mileage fees.

(Signature of Server)

(Print Name)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Rider to Harrah's Illinois Corporation Subpoena

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 3. “You” and “Your” shall refer to Harrah’s Illinois Corporation.
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 5. “Communication(s)” shall include any oral or written communication or contact between two or more persons or entities, including without limitation written contact by such means as a letter, memorandum, telegram, telex, or any other document or documents, and oral contact, heard or overheard, by such means as a face-to-face meeting, radio, telephone conversation, or otherwise, and every other mode of intentionally conveying meaning.
 6. “Document(s)” shall include any method of recording or preserving information in its broadest sense (by written, electronic or other means), including but not limited to letters, memoranda, work papers, e-mail, checklists, forms, drafts, reports, analyses, notes, diaries, calendars, logs, computer disks or tapes or print outs, data files, tape recordings or transcriptions thereof, photographs, microfilm, microfiche, any other thing encompassed within the meaning of the term “Document” as used in the Code of Civil Procedure and the Illinois Supreme Court Rules and Communications as defined above.
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- F. In responding to the Requests, produce all Documents known or available to You regardless of whether such Documents are in Your direct possession or in the possession of Your agents, partners, employees, or representatives or are otherwise under Your control.
- G. If any Document responsive to any Request is no longer in Your possession, custody, control or care, state whether the Document: (i) is missing or lost; (ii) has been destroyed; (iii) has been transferred voluntarily or involuntarily to others; or (iv) has been otherwise disposed of or discarded. In each such situation, set forth the facts surrounding such disposition, identify the person(s) directing or authorizing the disposition and list the disposition date.
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1. State the nature of the claim of privilege or nondisclosure and the basis for the claim;
 2. A description of all Documents, including:
 - a. The date of the Document;
 - b. The name and job title of its author(s) or preparer(s);
 - c. The name and job title of each person to whom the Document was sent or who has seen, had access to, or custody of the Document;
 - d. The Request to which the Document is responsive; and
 - e. In the case of any Document that relates in any way to an oral Communication, identify the participants and attendees of such Communication.
 3. Identify all persons on whose behalf the claim of privilege or nondisclosure is being asserted;
 4. Identify all persons having knowledge of any facts related to the claim of privilege or nondisclosure; and
 5. State all facts relied upon in support of or related to the assertion of privilege or nondisclosure.